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August 10, 2023

Via ECF

The Honorable John G. Koeltl
United States District Judge
500 Pearl Street
United States Courthouse, Courtroom 14A
New York, NY 10007

*Application granted.
No pre-motion conference
necessary.
So ordered.
Jr G/Koeltl
8/11/23*

Re: *Grant et al. v. Trump et al., Case No. 1:20-cv-07103-JGK*

Dear Judge Koeltl:

This firm represents plaintiffs Edmond Grant p/k/a "Eddy Grant", Greenheart Music Limited, a United Kingdom Limited Company, and Greenheart Music Limited, an Antigua and Barbuda Limited Company ("Plaintiffs") in the above-referenced infringement action against defendants Donald J. Trump ("Trump") and Donald J. Trump For President, Inc. (the "Company," and together with Trump, "Defendants"). We write pursuant to Your Honor's Individual Practices Rule I.E., and with consent from Defendants, to request an extension of the deadline for the parties to file motions for summary judgment, which is currently August 18, 2023.

This is the second request for an extension of the summary judgment deadline. On June 21, 2023, the Court ordered Defendants' request to reset the deadlines to file dispositive motions and a pretrial order. The parties have recently conferred, and due to scheduling conflicts and upcoming holidays, the parties respectfully request that the deadline to file dispositive motions be extended to September 15, 2023, with oppositions due October 6, 2023, and replies, if any, due October 20, 2023.

Additionally, the parties request clarification whether a pre-motion conference is necessary pursuant to Your Honor's Individual Practices Rule II.B for the intended motion. If so, the parties respectfully request a date for the conference at the Court's convenience towards the end of August.

We thank the Court for its attention to this matter.

Respectfully submitted,

s/ Brett Van Benthysen
Brett Van Benthysen

cc: Counsel of Record

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